

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

Case Number:

V.

(01) WILLIAM WELLINGTON WILLIAMS

(02) KEVIN EUGENE DAVIS

12-mj-223-AJB

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 26, 2012 in Hennepin county, in the State and District of Minnesota defendant, did aid and abet, did knowingly, by force, violence, and intimidation, attempt to take from the person and presence of a victim teller United States currency belonging to and in the care, custody, control, management, and possession of the TCF Bank located in Brooklyn Center, Minnesota, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person, all

in violation of Title 18, United States Code, Section 2113(a) and Title 18, United States Code, Section 2.

I further state that I am a(n) Special Agent and that this complaint is based on the following

facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Date

The Honorable Arthur J. Boylan
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer

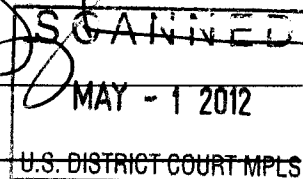
Signature of Complainant

David T. Walden
FBI

at

Minneapolis, MN
City and State

Signature of Judicial Officer



STATE OF MINNESOTA)
) ss. AFFIDAVIT OF David T. Walden
COUNTY OF HENNEPIN)

I, David T. Walden, being duly sworn under oath, depose and state as follows:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and my primary assignment is the investigation of bank robbery matters and other violent crimes. I have been a Special Agent since November 1999.

2. This affidavit is submitted in support of a criminal complaint against WILLIAM WELLINGTON WILLIAMS, date of birth September 13, 1983, and KEVIN EUGENE DAVIS, date of birth December 29, 1978, on grounds that they committed a violation of Title 18, United States Code, Section 2113(a) - Bank Robbery. The elements of this offense are as follows: (1) the defendant used force, violence, or intimidation; (2) in taking money belonging to a financial institution; and (3) the deposits of that financial institution were then insured by the Federal Deposit Insurance Corporation (FDIC).

3. This affidavit is based on my training, experience, personal knowledge and observations in this investigation; upon my discussions with other law enforcement officers and agents directly involved in this investigation; and, upon my review of official reports submitted in relation to this investigation. In connection with my official duties, I have participated in the investigation

of the April 26, 2012, robbery of the TCF Bank, located at 3245 County Road 10, Brooklyn Center, Minnesota (hereinafter, "the bank"). I have also participated in the investigation of the April 20, 2012, robbery of the TCF Bank located at 7555 West Broadway, Brooklyn Park, Minnesota. In connection with my official duties, I have obtained the following information through my investigation, from other FBI agents, from Hennepin County Sheriff deputies, from Brooklyn Center Police (BCP) officers, and from Brooklyn Park Police (BPP) Officers.

4. This affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant and therefore contains only a summary of relevant facts.

5. In April 2012, multiple banks were robbed in the Twin Cities Metro area. Based on investigation by the FBI and local law enforcement, WILLIAM WELLINGTON WILLIAMS became a person of interest. In particular, on April 20, 2012, the TCF Bank located at 7555 West Broadway Avenue, Brooklyn Park, Minnesota, was robbed. FBI agents obtained surveillance photographs and video from this robbery and showed them to WILLIAMS' federal probation officer, and the probation officer positively identified WILLIAMS as the robber.

Based on this, and other information obtained during the course of the investigation, law enforcement began to conduct surveillance on WILLIAMS.

6. On or about Thursday, April 26, 2012, at approximately 8:55 a.m., Special Agents (SAs) of the FBI and a Hennepin County Sheriff's Deputy initiated surveillance at 1435 4th Street Northeast, Minneapolis, Minnesota. At approximately 9:10 a.m., WILLIAM WELLINGTON WILLIAMS, was observed near the address wearing a blue and white basketball jersey entering a blue 2002 Chevrolet Tahoe with Minnesota license plate 204 ATD. Throughout that morning, WILLIAMS was observed driving that vehicle with at least one other black male adult in the front passenger seat. The vehicle made several stops and at approximately 10:30 a.m., ultimately drove to the Cub Foods located at 3245 County Road 10, Brooklyn Center, Minnesota; the bank was co-located with the Cub Foods at that address.

7. The blue Tahoe was observed parking in the lot some distance from the Cub Foods entrance doors. WILLIAMS' black male passenger (subsequently identified as KEVIN EUGENE DAVIS) exited the passenger side of the vehicle and walked into the Cub Foods. DAVIS walked through several grocery aisles while talking on a cellular phone and within visual distance of the bank located within the grocery store behind the cashier counters. DAVIS ultimately selected a package of diapers, paid and exited the store.

8. DAVIS returned to the blue Tahoe and entered the passenger side of the vehicle. The blue Tahoe started to move slowly through the parking lot and drove in an indirect manner toward an exit. The blue Tahoe drove into the Wendy's parking lot where WILLIAMS parked the vehicle. DAVIS departed the vehicle and walked toward the Wendy's entrance. WILLIAMS was observed outside the vehicle changing his clothing by putting on a hooded jacket and baseball hat. When DAVIS returned to the blue Tahoe, DAVIS entered the driver side and WILLIAMS then occupied the passenger side. The blue Tahoe returned to the Cub Foods parking lot. DAVIS stopped near the entrance doors and WILLIAMS departed the vehicle en route to the TCF Bank located within the Cub Foods. DAVIS drove the blue Tahoe to the west side of the store where he reversed the vehicle into a parking spot with the front of his vehicle facing out.

9. At approximately 11:00 a.m., FBI agents, who were secreted within the Cub Foods, observed WILLIAMS standing near the entrance to the bank. WILLIAMS waited at the entrance until a teller became available for service. WILLIAMS entered the bank, pulled a bag out of his pocket and displayed a demand note to the teller which read, "Put the Money in Bag Now...or Die..." The victim teller immediately complied with the demand for cash and pulled currency from her cash drawer and placed it on the counter in front of WILLIAMS. WILLIAMS grabbed the money and placed it into his bag. While WILLIAMS reached for additional cash, FBI

agents, with weapons drawn, entered the bank and announced their presence. Agents ordered WILLIAMS to the ground and placed him under arrest without incident.

10. After WILLIAMS was controlled and in custody, interior agents communicated to the exterior arrest team that one subject was in custody. Exterior agents converged on the blue Tahoe and placed DAVIS under arrest without incident.

11. After the arrests, an interview was conducted with the victim teller. The victim teller described similar events as described above from her own perspective. The victim teller described the note and its print as "dark and creepy." The words, "Put the money in the bag or die," were traced numerous times for an even more menacing appearance. During the robbery, WILLIAMS talked loudly and said, "Hurry up! I don't want a dye pack! I want ones and fives and everything!" The victim teller added that she was scared and feared for her life. At the time of the robbery, the deposits at the bank were federally insured by the Federal Deposit Insurance Corporation (FDIC) with certificate number 28330.

12. WILLIAMS and DAVIS were interviewed separately by law enforcement following their arrest. Both WILLIAMS and DAVIS were advised of their rights under Miranda, and they both stated that they understood their rights and agreed to waive them. WILLIAMS and DAVIS both admitted that they robbed the bank on April 26,

2012. WILLIAMS also confessed to robbing the TCF Bank on April 20, 2012.

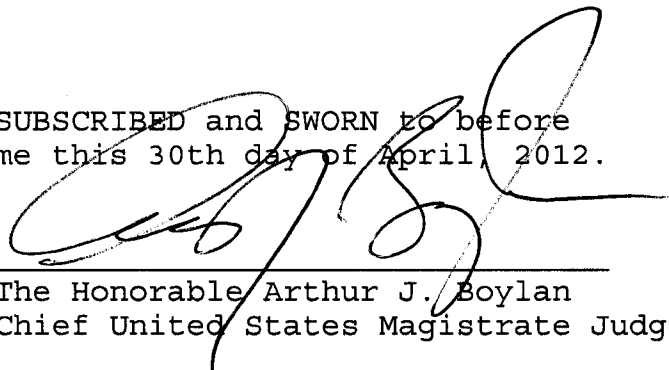
13. Based on the above information, I submit there is probable cause to believe that WILLIAM WELLINGTON WILLIAMS, date of birth September 13, 1983, and KEVIN EUGENE DAVIS, date of birth December 29, 1978, did commit bank robbery against the United States, in violation of Title 18, United States Code, Section 2113 (a), and Title 18, United States Code, Section 2.

Further your Affiant sayeth not.



David T. Walden
Special Agent,
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before
me this 30th day of April, 2012.



The Honorable Arthur J. Boylan
Chief United States Magistrate Judge